

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

03-MDL-1570 (GBD)(SN)

In re: TERRORIST ATTACKS ON SEPTEMBER 11, 2001

DEFENDANT JELAIDAN'S STATUS REPORT

COMES NOW, Defendant Jelaidan through undersigned counsel hereby gives a status report to the Court on Defendant's request to Office of Foreign Assets Control (hereinafter "OFAC") to issue an appropriate license so that Plaintiffs can collect on their judgment. More than six months ago, in order to comply with Judge Daniels' March 9th, 2016 Order, undersigned counsel sent off a letter to OFAC requesting the issuance of a license. Please see attached. Undersigned counsel has not yet received a response from OFAC regarding this issue. As this Court probably knows, OFAC operations are quite bureaucratic in nature. Undersigned counsel has sent other letters to OFAC on different matters and has yet to receive acknowledgement of their receipt. In the interest of judicial economy, undersigned counsel will send out another letter asking OFAC personnel for an update on the original request for a license at the end of October.

Respectfully Submitted



Martin F. McMahon, *esq.*
Martin McMahon & Associates
Attorney for Defendant

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VICTORIA DODEV
International Coordinator

April 8, 2016

Office of Foreign Assets Control
U.S. Department of the Treasury
Treasury Annex
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Re: SDGT – 0662 Wael Jelaidan

Dear Madam/Sir:

Our firm represents Wael Jelaidan, an individual your office designated as an SDGT. He has bank accounts in Switzerland, and we believe that your designation requires those banks not to disburse any of those funds without your authority or the issuance of a license. We hereby are making application for an OFAC license.

Our client would like to pay for an award of attorney fees which was ordered by Magistrate Judge Frank Maas in the U.S. District Court for the Southern District of New York. *See Memorandum Opinion*, at 38-39, 43, 44 (Oct. 28, 2015) (ECF No. 3087) (attached hereto as Exhibit A). The fees are payable to three law firms:

| Law firm | Fees | Fee Award | Expenses | total |
|----------------|------------|-----------|----------|---------------------|
| Anderson Kill | 0 | 3,448.54 | 0 | 3,448.54 |
| Cozen O'Connor | 90,600.00 | 3,448.54 | 978.50 | 95,027.04 |
| Motley Rice | 29,964.38 | 3,448.54 | 2,731.97 | 36,144.89 |
| Total | 120,564.38 | 10,345.63 | 3,710.47 | \$134,620.48 |

The addresses of these three law firms are as follows:

Anderson Kill & Olick, P.C.
Attn: Jerry Goldman, Esquire
1600 Market Street, Suite 2500
Philadelphia, PA 19103-7225

Cozen O'Connor, P.C.
Attn: Sean Carter, Esquire
1650 Market Street, Suite 2800
Philadelphia, PA 19103-7325

Motley Rice, LLC
Attn: Michael Elsner, Esquire
28 Bridgeside Boulevard
Mount Pleasant, SC 29464-4375

Please let us know if OFAC requires any further information for issuing this license.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Martin F. McMahon", written over a horizontal line.

Martin F. McMahon, Esq.
Managing Partner

Encl.